

September 9, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20852

1440 10 OCT 29 1999

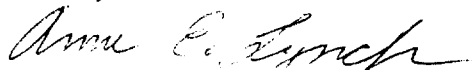
RE: Docket Numbers: 98N-1230, 96P-0418, 97P-0197

To Whom It May Concern:

Each year the United States Egg Industry force molts (intentionally starves for up to 14 days) millions of hens to manipulate egg production. Forced molting is so stressful it destroys the hens' immune system, predisposing the birds and their eggs to salmonella infection. The United State Department of Agriculture's Food Safety and Inspection Service (FSIS) stated: "FSIS recognizes that public health concerns are raised by highly stressful forced molting practices. For example, extended starvation and water deprivation practices lead to increased shedding of *Salmonella enteritidis* (Se) by laying hens subjected to these practices."

The FDA has jurisdiction to ban farm practices that injure human health. Therefore, the FDA should ban the practice of forced molting because it has been scientifically shown to promote disease by destroying the starving hens' immune system. Forced molting of laying hens is the primary cause of infectious diseases in hens, eggs, and consumers of eggs. The FDA was petitioned in April 1998 to ban forced molting. This petition should be granted without further delay. Putting Bacteria warning labels on egg cartons and regulating refrigeration temperatures is not enough to ensure human safety.

Sincerely,

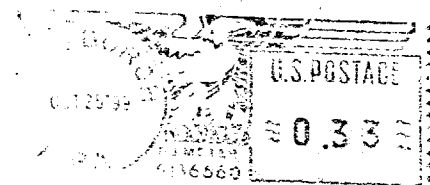


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97P-0197

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CROSS FILE SHEET

File Number:

98N-1230/ C 777

See File Number:

97P-0197/ C 778

96P-0418/ C 777